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Commenter: Campaign for Telecommunications Access
§ 271 Applicant: SBC Communications, Inc.
States: Kansas and Oklahoma

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Application by SBC Communications Inc.
for Authorization under Section 271
of the Communications Act to Provide
In-region, InterLATA Service in the
States of Kansas and Oklahoma

CC DOCKET NO. 00-217

TO: The Commission

Reply Comments of Campaign for Telecommunications Access; American Association of Retirement Communities; American Council of the Blind; American Council of the Blind of Texas; American Council of Blind Enterprises & Services, Inc.; Ann Arbor Center for Independent Living; Assistive Technology for Kansans; Linda Baker-Oberst, Disability Area Representative, Missouri Governor's Council on Disabilities; Robert S. Barela, Board Member of the National Hispanic Counsel on Aging; Center for Independent Living for SW Kansas; Central Iowa Center for Independent Living; Coast Line College Foundation Emeritus Program; California Congress of Senior Citizens; Diane Coleman, Executive Director, Progress Center for Independent Living; Benjamin A. Collier, Vice Chairman, Alzheimers Committee, [continued on second cover page]

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December 11, 2000

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[Commenters continued from first cover page] National Association of Federal Employees; Wally Daeley, Representative for Montana, National Committee to Preserve Social Security and Medicare; Deaf, etc., Grand Rapids Center for Independent Living; Deaf Women of Austin; Harris J. Ducote, Member and past Chair of the Louisiana Executive Commission on Aging; Everybody Counts, Inc.; The Reverend Edward Fields, Member, Missouri Governor's Commission on Special Health, Psychological & Social Needs of Minority Older Individuals; Milissa Gofourth, Policy/Funding Specialist with the Oklahoma ABLE Tech Project of the OSU Wellness Center; Good News Grannies; Josephine L. Gould, Former President, Georgia Silver Haired Legislature, and Member, Atlanta Regional Commission Advisory Board on Aging; Dr. David B. Gray, Program in Occupational Therapy, Washington University School of Medicine; Karen Hirsch, Ph.D., Consultant, Missouri Institute of Mental Health; Illinois Council of the Blind; IMPACT; Kansas Silver Haired Legislature; Donna J. Kidd, Former Director, Jayhawk Area Agency on Aging, and Past President, Topeka Chapter of Linx Incorporated; Homer Lear, Speaker Emeritus of the Texas Silver Haired Legislature; Gerri Lewis, Member, Tulsa Commission on Aging; Living Independence for Everyone; LINK, Inc.; Donnie Martin, Texas Delegate to National Silver Haired Congress; Jack McSpadden, Consultant on Adaptive Technology; Memphis Center for Independent Living; Mideast Area Agency on Aging; National Council of Silver Haired Legislatures; Northeast Missouri Council of the Blind; Options for Independent Living, Inc.; Resource Center for Independent Living; Ray Roberts, Speaker of House Emeritus, Florida Silver Haired Legislature; Pauline Roehrkaske, Nebraska Silver Senator, National Silver Haired Congress; Southern Indiana Center for Independent Living; Spa Area IL Services, Inc. (SAILS); Texas Association for the Deaf; Texas Money Management Program, Family Elder Care; Texas Retired Teachers Association; Texoma Aging and Developmental Disability Coalition; Virginia Zachert, Ph.D., Professor Emerita, Medical College of Georgia, and Retired Captain, US Air Force

Reply Comments

The Campaign for Telecommunications Access; American Association of Retirement Communities; American Council of the Blind; American Council of the Blind of Texas; American Council of Blind Enterprises & Services, Inc.; Ann Arbor Center for Independent Living; Assistive Technology for Kansans; Linda Baker-Oberst, Disability Area Representative, Missouri Governor's Council on Disabilities; Robert S. Barela, Board Member of the National Hispanic Counsel on Aging; Center for Independent Living for SW Kansas; Central Iowa Center for Independent Living; Coast Line College Foundation Emeritus Program; California Congress of Senior Citizens; Diane Coleman, Executive Director, Progress Center for Independent Living; Benjamin A. Collier, Vice Chairman, Alzheimers Committee, National Association of Federal Employees; Wally Daeley, Representative for Montana, National Committee to Preserve Social Security and Medicare; Deaf, etc., Grand Rapids Center for Independent Living; Deaf Women of Austin; Harris J. Ducote, Member and past Chair of the Louisiana Executive Commission on Aging; Everybody Counts, Inc.; The Reverend Edward Fields, Member, Missouri Governor's Commission on Special Health, Psychological & Social Needs of Minority Older Individuals; Milissa Gofourth, Policy/Funding Specialist with the Oklahoma ABLE Tech Project of the OSU Wellness Center; Good News Grannies; Josephine L. Gould, Former President, Georgia Silver Haired Legislature, and Member, Atlanta Regional Commission Advisory Board on Aging; Dr. David B. Gray, Program in Occupational Therapy, Washington University School of Medicine; Karen Hirsch, Ph.D., Consultant, Missouri Institute of Mental

Health; Illinois Council of the Blind; IMPACT; Kansas Silver Haired Legislature; Donna J. Kidd, Former Director, Jayhawk Area Agency on Aging, and Past President, Topeka Chapter of Linx Incorporated; Homer Lear, Speaker Emeritus of the Texas Silver Haired Legislature; Gerri Lewis, Member, Tulsa Commission on Aging; LINK, Inc.; Living Independence for Everyone; Donnie Martin, Texas Delegate to National Silver Haired Congress; Jack McSpadden, Consultant on Adaptive Technology; Mideast Area Agency on Aging; National Council of Silver Haired Legislatures; Northeast Missouri Council of the Blind; Options for Independent Living, Inc.; Resource Center for Independent Living; Ray Roberts, Speaker of House Emeritus, Florida Silver Haired Legislature; Pauline Roehrkas, Nebraska Silver Senator, National Silver Haired Congress; Southern Indiana Center for Independent Living; Spa Area IL Services, Inc. (SAILS); Texas Association for the Deaf; Texas Money Management Program, Family Elder Care; Texas Retired Teachers Association; Texoma Aging and Developmental Disability Coalition; Virginia Zachert, Ph.D., Professor Emerita, Medical College of Georgia, and Retired Captain, US Air Force submit these reply comments under the consolidated name "the Campaign."

The 51 organizations and individuals who are participating in this filing of the Campaign as well as those who participated in the earlier comments in this matter work to assure that new telecommunications technologies will be available to, usable by, and affordable for all citizens, regardless of where they live and regardless of what disability or other condition they may have that is a barrier to their using some kinds of equipment.

In addition to those who participated in the early filing, the Campaign is joined by the following individuals and organizations (reference to an organization for each participant marked with an asterisk is for identification purposes only):

Ann Arbor Center for Independent Living
James Magyar, Executive Director
Ann Arbor, Michigan

Center for Independent Living for SW
Kansas
Troy Horton, Executive Director
Garden City, Kansas

Diane Coleman*
Executive Director
Progress Center for Independent Living
Forest Park, Illinois

Deaf, etc.,
Grand Rapids Center for Independent
Living
Kim Kenerem
Grand Rapids, Michigan

Living Independence for Everyone
Gail Kear, Executive Director
Bloomington, Illinois

Milissa Gofourth*
Policy/Funding Specialist
Oklahoma ABLE Tech Project of the OSU
Wellness Center
Oklahoma City, Oklahoma

Memphis Center for Independent Living
Deborah Cunningham, Executive Director
Memphis, Tennessee

Resource Center for Independent Living
Mary Holloway, Executive Director
Osage City, Kansas

Spa Area IL Services, Inc. (SAILS)
Brenda Tweedle, Executive Director
Hot Springs, Arkansas

The Campaign has filed comments in other Commission proceedings and has participated in other telecommunications regulatory proceedings.

The Campaign's reply comments are these:

The Campaign's constituents rely on existing local telephone companies, like Southwestern Bell, to assure that they will have local telephone service. In the course of

getting such service, the Campaign's have a major and immediate interest in being able to get access to broadband technologies like ADSL service.

One major reason that these constituents rely upon the existing telephone companies is that new competitors make it eminently they are not interested in low-end residential consumers who commonly are among the Campaign's constituents. New competitor are interested in business customers and sometimes high-end residential customers, but now small end customers.

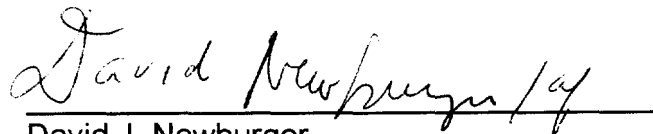
No doubt, the new competitors take that position because it is more profitable. That suggests that the traditional local telephone companies will shape their business plans to follow the lead of the new competitors. Thus, new competitors will not serve residential customers. Old telephone companies will look for opportunities to act like new competitors, but outside their traditional, regulated territories. And, interest in low-end residential customers will decline. In that scenario, new telephone companies win; old telephone companies win; many residential customers allocated to the wrong side of the digital divide.

If the FCC facilitates allowing the old telephone companies into long distance competition in their services areas, their prospects for profitability in their service areas increases. That creates the opportunity for the old telephone companies to have a greater interest in their high- and low-end residential customers. And that, in turn, gives the Campaign's constituent the chance to universally located, universally designed telecommunications services – the fundamental bottomline goal of the Campaign.

I. Conclusion

For the reasons stated here, and in their original comments, the Campaign believes that allowing SBC into the business of providing long-distance service to customers in Kansas and Oklahoma and its other universal service areas will have at least two benefits in the public interest. SBC's entry into the business will enhance the possibility that SBC will focus on assuring that it provides the best present and future telecommunications services in its service areas, including putting downward pressure on long-distance service prices. Second, allowing SBC into the business will create a choice of a long-distance service provider that will simplify service and billing options for many customers and otherwise assure that all its services are fully accessible. Therefore, the Campaign suggests the Commission should approve SBC's application.

Respectfully submitted,

A handwritten signature in cursive script, reading "David Newburger /af", written over a horizontal line.

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Newburger & Vossmeier
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Telecommunications Access
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Certificate of Service

I certify that the foregoing has been filed with Magalie Roman Salas, Commission Secretary, Federal Communications Commission, to Eva Powers, Kansas Corporation Commission, 1500 S.W. Arrowhead Rd., Topeka, Kansas 66604-4027, and to Joyce Davidson, Oklahoma Corporation Commission, Jim Thorpe Office Building, P.O. Box 52000-2000, Oklahoma City, Oklahoma 73152-2000, and to the list of commenters participating in this proceeding by U.S. Mails, postage prepaid this December 11, 2000.

A handwritten signature in black ink, reading "David Newberry / of", is written over a horizontal line.